

MEMO ENDORSED

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May 27, 2021

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court
Southern District of New York
Thurgood Marshall
United States Courthouse
40 Foley Square
New York, NY 10007

Re: *Williams v. Bloomscape, Inc.*,
Case No.: 1:21-cv-1266

Dear Judge Caproni,

The undersigned represents Milton Williams, on behalf of himself and all other persons similarly situated ("Plaintiff") in the above referenced matter against Defendant, Bloomscape, Inc., ("Defendant"). The undersigned respectfully requests that the Initial Conference scheduled for June 11, 2021, at 10:00 AM (Dkt. 6) be adjourned for 60 days because Counsel for Defendant has not yet answered or appeared in this action. Additionally, the undersigned respectfully requests Your Honor extend the time to effectuate service upon the Defendant; the Process Server has been diligently trying to serve the Defendant but has not yet been successful. Courtesy copies of the Summons and Complaint were sent to the Defendant via-email on February 15, 2021. This request will grant ample time for the Defendant to retain counsel and for Defendant's Counsel to appear and discuss a possible resolution with Plaintiff's Counsel. This is the Plaintiff's first request for an adjournment.

Not later than **June 4, 2021**, Plaintiff must show cause why this case should not be dismissed for failure to serve within the time limits set forth in Rule 4(m). Plaintiff must specifically describe his efforts to serve Defendant and explain why Plaintiff waited two weeks until after the 90-day period set forth in Rule 4(m) had expired to request that the Court grant an extension.

SO ORDERED.


6/1/2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE

Respectfully submitted,

GOTTLIEB & ASSOCIATES

/s/Michael A. LaBollita, Esq.
Michael A. LaBollita, Esq.